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Attorneys for
Defendant CoinMarketCap OpCo, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Ryan Cox, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

CoinMarketCap OpCo, LLC; Binance
Capital Management Co., Ltd. d/b/a Binance
and Binance.com; BAM Trading Services
Inc. d/b/a Binance.US; Changpeng Zhao;
Catherine Coley; Yi He; Ted Lin; and Does
I-X;

Defendants.

Case No. 21-cv-08197-PCT-SMB


DEFENDANT
COINMARKETCAP OPCO,
LLC's RESPONSE TO
PLAINTIFF'S MOTION FOR
RECONSIDERATION

Pursuant to the Court's Order dated January 11, 2022 (ECF No. 39), CoinMarketCap OpCo, LLC ("CMC"), by and through undersigned counsel, acknowledges that it has been served in this action, and it does not oppose Plaintiff's motion for reconsideration of this Court's dismissal for lack of service. As set forth in the Joint Stipulation dated November 3, 2021 (ECF No. 16), which was so ordered by this Court on November 5, 2021 (ECF No. 17), CMC reserves all rights and defenses,

1 including, without limitation, any and all jurisdictional, venue, or forum-related rights
2 and defenses. CMC anticipates filing a motion to dismiss pursuant to Fed. R. Civ. P.
3 12(b) within sixty (60) days of service of all Defendants, but to its knowledge, not all
4 individual Defendants have been served.

5 RESPECTFULLY SUBMITTED this 18th day of January 2022.

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9 By: 

10 Andrea S. Tazioli (#026621)
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12 *CoinMarketCap OpCo, LLC*

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17 By: /s/ Karen R. King (with permission)
18 Karen R. Ring (*pro hac vice*
19 *forthcoming*)
20 *Attorneys for Defendant*
21 *CoinMarketCap OpCo, LLC*
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CERTIFICATE OF SERVICE

I certify that on the 18th day of January 2022, I electronically transmitted the foregoing document to the Office of the Clerk of the Court, using the CM/EFC System, for filing and for transmittal of a Notice of Electronic Filing to the CM/EFC registrants on record.

/s/ Sarah Flaaen